

# UNITED STATES DISTRICT COURT

for the  
Eastern District of Pennsylvania

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Maroon 2006 Chevrolet Trailblazer, vehicle identification  
number 1GNDDT13S362237386, bearing Pennsylvania tag  
JPB-6437

Case No. 19-1339-M

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment "A"

located in the Eastern District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

Maroon 2006 Chevrolet Trailblazer, vehicle identification number 1GNDDT13S362237386, bearing Pennsylvania tag JPB-6437

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

### Code Section

18 U.S.C. § 1951(a)  
18 U.S.C. § 924(c)(1)

### Offense Description

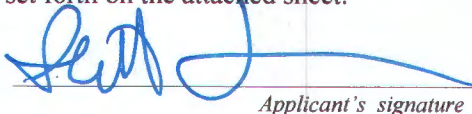
Attempted Hobbs Act robbery  
Carrying, using and brandishing a firearm during and in relation to a crime of violence

The application is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

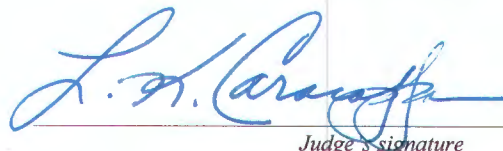
SCOTT A. FRIEDENREICH, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/6/2019



Judge's signature

City and state: PHILADELPHIA, PENNSYLVANIA

HON. LINDA K. CARACAPPA, U.S.M.J.

Printed name and title

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Scott A. Friedenreich, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since December 2008. I am currently assigned to the Philadelphia Field Office where I work on the Violent Crimes Task Force ("VCTF"). I investigate crimes such as commercial robberies and burglaries, carjackings and other related crimes. Before being assigned to the VCTF, I was assigned to the Health Care Fraud Task Force for nine years. I have written, sworn to, and executed numerous search warrant affidavits. I have directed cooperating witnesses to conduct consensual recordings and assisted other investigators in consensual recordings. I have testified in grand jury and federal trial. During the course of my investigations, I have subpoenaed and analyzed telephone toll and subscriber records and obtained historical cell site data that was used as evidence in my investigations. Before my employment at the FBI, I was a state of Delaware Probation and Parole Officer for approximately six years.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show that there is probable cause for the requested search warrant and does not set forth all of the facts about this investigation.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that evidence of violations of 18 U.S.C. § 1951 (Hobbs Act robbery) and 18 U.S.C. § 924(c) (carrying, using, and discharging a firearm during and in relation to a crime of violence) will be located in a maroon 2006 Chevrolet Trailblazer, vehicle identification



number ("VIN") 1GNDT13S362237386, registered to ANTHONY WALLACE, 2828 North Wallace Street, Apartment 1, Philadelphia, Pennsylvania 19132<sup>1</sup> and bearing Pennsylvania tag JPB-6437<sup>2</sup> (Target Vehicle). This affidavit is being submitted in support of an application for search warrant for the Target Vehicle, which is more fully described in Attachment "A" and incorporated herein.

4. On August 1, 2019, at approximately 10:01 a.m., two black males (hereinafter, "The Males") dressed in dark-colored clothing attempted to commit an armed robbery of a Garda armored vehicle that was attempting to make a delivery of cash to an outdoor service ATM machine at the PNC Bank, located at 3535 Market Street, Philadelphia, Pennsylvania. While attempting to make the delivery, one of the guards walked towards the ATM machine carrying two bags filled with United States currency, while the other remained at the truck. The Males, who were armed with a handgun and an assault rifle with a red and black strap attached to it, approached the guard who was attempting to make the delivery. The Males pointed their guns at the guard and stated, "give it up," causing the guard to drop the money.

5. The Males retrieved the cash filled bags and attempted to flee the area. As The Males were fleeing, the armed guards fired their guns at them. The Males dropped the bags of money and fled. A Glock handgun and a magazine from an assault rifle

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<sup>1</sup> Pennsylvania Department of Transportation records lists the address as 2828 North Lambert Street, Apartment 1; however, the actual physical residence is apartment I.

<sup>2</sup> This tag is registered to a different VIN number than the one affixed to the Target Vehicle.

containing ammunition were recovered in the area where the men fled. At this time, it is not known if the two males fired at the victimized guards.

6. One of The Males fled on foot eastbound on Market Street, the other male fled northbound on 36th Street carrying the assault rifle and entered the passenger side of the Target Vehicle that was driven by a third person. The male who entered the vehicle still carrying the assault rifle was wearing a black mask, black long sleeved hooded sweatshirt or long sleeved shirt with a white shirt underneath, black pants and black sneakers with white soles.

7. A short time after the aforementioned attempted armed robbery, the Target Vehicle was located by law enforcement at 3614 Pearl Street, Philadelphia, Pennsylvania. There were bullet holes in the vehicle and a walkie-talkie radio was observed in plain view inside the vehicle. In addition, a black cloth bag was located and recovered from the street just outside the vehicle.

8. The vehicle identification number (VIN) for the Target Vehicle is 1GNDT13S362237386. Investigation revealed that this vehicle is registered to ANTHONY WALLACE<sup>3</sup> at 2828 North Lambert Street, Apartment 1, Philadelphia, Pennsylvania 19132 (Target Location). Investigation also revealed that the vehicle had a previous registration tag of JZA-2837. When located by law enforcement, the vehicle had a different Pennsylvania registration tag JPB-6437. The investigation further revealed that

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<sup>3</sup> On August 2, 2019, investigators reviewed video from surveillance cameras at 2828 North Lambert Street, Philadelphia, Pennsylvania, and viewed WALLACE at 2828 North Lambert Street at the time of the attempted robbery.



this registration tag number is associated with a different VIN than what is affixed to the Target Vehicle. Also, that VIN number is registered to a different person.

9. Investigators went to the Target Location, cleared the location for safety and spoke with a woman who was present inside the home, "S.V.", who identified herself as being in a relationship with WALLACE. According to "S.V.", WALLACE was not home at the time, nor was he located during a safety sweep of the home. The directory at the apartment building lists unit I as "A Wallace."

10. On August 1, 2019, your affiant and other investigators from the VCTF executed a search warrant at the Target Location. Among the items seized were a .45 caliber handgun, a .22 caliber handgun, a 12 gauge shotgun, Pennsylvania license tags<sup>4</sup>, walkie-talkie radios<sup>5</sup>, suspected crack cocaine, scales commonly used by drug dealers to weigh drugs for distribution, and packaging materials commonly used by drug dealers to package drugs for sale.

11. Your affiant knows through training and experience that individuals involved in criminal activity such as armed robberies and related offenses, will keep implements used to commit their crimes and proceeds of their crimes at secure locations to which they have access, including their homes and vehicles. Through my training and experience, I know that some of the items maintained at these secure locations include

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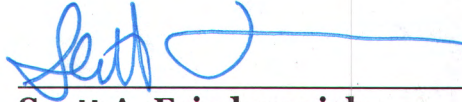
<sup>4</sup> As referenced in this affidavit, the Target Vehicle bore a tag that is registered to a different vehicle.

<sup>5</sup> Your affiant knows through training and experience that walkie-talkie radios are used by individuals who commit crimes, including armed robberies, to communicate with "get away" drivers and other conspirators. As referenced in this affidavit, a walkie-talkie radio was observed inside the Target Vehicle.

disguises, weapons, ammunition, cellular phones, cash, items stolen from victims, clothing worn while committing the crimes, walkie-talkie radios, and other items similar items used to facilitate such crimes. As referenced in this affidavit, one of the males was still in possession of the assault rifle used in this robbery when he fled from the scene.

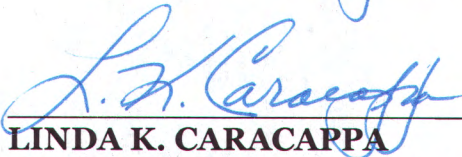
12. Based on my training and experience, I know that people who engage in the type of criminal activity described herein will often communicate with their coconspirators and/or accomplices by way of cellular telephone (including via text message) before, during, and after the commission of a robbery. Further, I am aware that people who engage in the type of criminal activity described herein will often use the internet (including on their cell phones) to search for information about their intended victims, such as the locations and hours of businesses. Further, I am aware that people who engage in the type of criminal activity described herein often possess photographs (including in their phones) of themselves and their coconspirators/accomplices, the victims of their crimes, clothing worn during their crimes, weapons and other items used during their crimes, the proceeds of their crimes and items purchased with the proceeds of their crimes. I also know from my training and experience that criminals, including those who engage in the type of criminal activity described herein, often have multiple phones to facilitate their commission of illegal activities while attempting to thwart identification by law enforcement through the use of multiple phones or "burner" phones which cannot be traced back to an individual.

13. Based on the facts provided in this affidavit, there is probable cause to believe that the items described herein and in Attachment "B" to this affidavit which is incorporated herein, are located in the Target Vehicle.



**Scott A. Friedenreich**  
**Special Agent**  
**Federal Bureau of Investigation**

Subscribed and sworn to before me  
this 6<sup>th</sup> day of August, 2019,



**LINDA K. CARACAPPA**  
**Chief United States Magistrate Judge**  
**Eastern District of Pennsylvania**

**ATTACHMENT "A"**

**LOCATION TO BE SEARCHED**

A maroon 2006 Chevrolet Trailblazer, vehicle identification number 1GNDT13S362237386, registered to ANTHONY WALLACE and bearing Pennsylvania tag JPB-6437.



**ATTACHMENT "B"**

**ITEMS TO BE SEIZED**

Handguns, assault type rifles, red and black strap, ammunition, holsters, dark-colored clothing, including masks, hoods, and disguises used during the commission of the attempted robbery described in this affidavit, including a black mask, black long sleeved hooded sweatshirt or long sleeved shirt with a white shirt underneath, black pants and black sneakers with white soles, walkie-talkie radios, cash and proceeds from the attempted robbery, and cellular telephones used in the commission and/or planning of the attempted robbery. Any paperwork or documentation showing ownership of the vehicle described in Attachment "A" and any documents and/or any other items identifying the occupants of the vehicle at the time of the attempted robbery.